

May 4, 2016

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The Honorable Raymond J. Dearie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Roger Huguet, 15 CR 585 (RJD)

Dear Judge Dearie:

We represent defendant Roger Huguet in the above-referenced case before the Court. We submit this letter to request a temporary modification of the conditions imposed as part of Mr. Huguet's release on bail in order to permit him to renew his passport. The government does not oppose this request.

Mr. Huguet waived indictment and pleaded guilty to various charges before Magistrate Judge Levy on November 17, 2015. At that time, with the government's consent, he was released on a \$1.5 million personal recognizance bond co-signed by his wife. Additional conditions of his release were that his travel would be restricted to New York City and Florida (where he resides), that he surrender his passport to the Federal Bureau of Investigation ("FBI"), and that any travel outside of New York or Florida be approved in advance by the FBI.

Mr. Huguet's passport, which is now in the custody of the FBI, will expire shortly. Mr. Huguet's mother, who lives in Spain, is elderly and in poor health. He wishes to renew his passport so that, in the future, if he needs to travel outside the country, and if the government consents, he will have a valid passport. There is no pending request to the government by Mr. Huguet for permission to travel outside the U.S., and the government has not agreed to permit future travel. Mr. Huguet simply wishes to be in a position to travel outside the U.S. with a valid passport in the future, if the government consents.

If the Court permits the FBI to return the passport, Mr. Huguet will not at any point in time be in possession of either his current passport or the new one. The procedure that Mr.

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Huguet has agreed upon with the government (if approved by the Court) is as follows: the FBI will return his current passport to the undersigned counsel, who will send it, along with Mr. Huguet's application for a new passport, to the State Department; the application will indicate that the new passport is to be mailed to counsel; when the new passport is received, counsel will provide it to the FBI.

The government has advised defense counsel that it does not oppose this request.

Accordingly, we respectfully request that the Court modify Mr. Huguet's bail conditions to allow the FBI to return his current passport to his counsel for the purpose of renewing it in the manner described above.

Respectfully submitted,



Ronald G. White

cc: AUSA Amanda Hector (via ECF)